

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

CHARLOTTE WINELAND, Individually, and
SUSAN WINELAND, as Personal
Representative of the Estate of JOHN DALE
WINELAND, Deceased,

Plaintiffs,

vs.

AIR & LIQUID SYSTEMS CORPORATION,
et al.

Defendants.

Case No.: 2:19-cv-00793-RSL

**STIPULATION MOTION AND ORDER
TO EXTEND EXPERT DISCLOSURE
DEADLINE FOR DEFENDANT PUGET
SOUND COMMERCE CENTER, INC.
FKA TODD SHIPYARDS
CORPORATION**

STIPULATION

1. The Parties served Expert Reports under FRCP 26(a)(2) on January 15, 2020, pursuant to the deadlines set by this Court. (Dkt. 83.)

2. Captain Charles Wasson, a Naval Engineering expert timely disclosed by Defendant Puget Sound Commerce Center, Inc. fka Todd Shipyards Corporation ("Todd"), prepared his expert report by January 15, 2020, but advised Counsel for Todd that due to his age and ill-health, he would not likely be able to sit for deposition or attend trial.

3. On February 3, 2020, Counsel for Todd was advised by the wife of Captain Wasson, that he had just passed away.

4. After meeting and conferring with Counsel for Plaintiffs, the parties have agreed to permit Todd to disclose a new Naval Engineering Expert, which Todd has done.

5. Pursuant to LCR 7(d)(1) and LCR 10(g), after meeting and conferring and obtaining agreement between the relevant parties, the parties hereby stipulate that there is good cause to extend the deadline for Todd to disclose a new expert to replace Charles Wasson, and serve a new expert report, under FRCP 26(a)(2), and extend the deadline for Plaintiffs to depose the new expert, disclosed by Todd, from February 14, 2020 (Dkt. 83) to February 28, 2020.

Report for Todd's new expert under FRCP 26(a)2):

Current Date: January 15, 2020

Proposed Date: February 15, 2020

Expert Discovery Deadline:

Current Deadline: February 14, 2020

Proposed Deadline: February 28, 2020

Dated: February 10, 2020

YARON & ASSOCIATES

By /s/ D. David Steele

GEORGE D. YARON

D. DAVID STEELE

Attorneys for Defendant Puget
Sound Commerce Center, Inc. fka
Todd Shipyards Corp.

February 10, 2020

FROST LAW FIRM

By/s/Andrew Seitz

SCOTT FROST

ANDREW SEITZ

Attorneys for Plaintiffs

ORDER

Based on the foregoing Stipulation of the parties, it is hereby ORDERED that the case deadlines in this matter shall be extended as set forth below to Defendant Puget Sound Commerce Center, Inc. fka Todd Shipyards Corp, only.

Report for Todd's new expert under FRCP 26(a)2):

Current Date: January 15, 2020

Proposed Date: February 15, 2020

Expert Discovery Deadline:

Current Deadline: February 14, 2020

Proposed Deadline: February 28, 2020

DATED this 11th day of February, 2020.



Robert S. Lasnik

United States District Judge